

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

STEWART ABRAMSON and JAMES EVERETT SHELTON, individually and on behalf of a class of all persons and entities similarly situated,

Plaintiffs

vs.

AGENTRA, LLC, KAREN MARIE EDWARDS, ANGELIC MARKETING GROUP L.L.C., THERESA JONES, and MATTHEW JONES,

Defendants.

Case No. 18-cv-615-PLD

COMPLAINT-CLASS ACTION

MOTION FOR ADMISSION *PRO HAC VICE* OF LAURA E. BRANDT

Laura E. Brandt, undersigned counsel for Agentra, LLC, hereby moves that she be admitted to appear and practice in this Court in the above-captioned matter pursuant to LCvR 83.2, LCvR 83.3, LCrR 83.2, and this Court's Standing Order Regarding *Pro Hac Vice* Admissions dated May 31, 2006 (Misc. No. 06-151).

In support of this motion, undersigned counsel attaches the Affidavit for Admission *Pro Hac Vice* of Laura E. Brandt filed herewith, which, it is averred, satisfies the requirements of the foregoing Local Rules and Standing Order.

Dated: November 6, 2019

Respectfully submitted,

/s/ *Laura E. Brandt*

William S. Richmond

Texas Bar. No 24066800

**Admitted Pro Hac Vice*

Laura E. Brandt

Texas Bar. No 24082369

**Pending Pro Hac Vice Admission*

PLATT CHEEMA RICHMOND PLLC

1201 N. Riverfront Blvd., Suite 150

Dallas, Texas 75307

Telephone: (214) 559-2700

Facsimile: (214) 559-4390

Email: brichmond@pcrfirm.com

Email: lbrandt@pcrfirm.com

**COUNSEL FOR DEFENDANT
AGENTRA, LLC**

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

STEWART ABRAMSON and JAMES
EVERETT SHELTON, individually and on
behalf of a class of all persons and entities
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Plaintiffs

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GROUP L.L.C., THERESA JONES,
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Defendants.

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COMPLAINT-CLASS ACTION

**AFFIDAVIT OF LAURA E. BRANDT IN SUPPORT
OF MOTION FOR ADMISSION *PRO HAC VICE***

I, Laura E. Brandt, make this affidavit in support of the motion for my admission to appear and practice in this Court in the above-captioned matter as counsel *pro hac vice* for Defendant, Agentra, LLC, in the above-captioned matter pursuant to LCvR 83.2, LCvR 83.3, LCrR 83.2, and this Court's Standing Order Regarding *Pro Hac Vice* Admissions dated May 31, 2006 (Misc. No. 06-151).

1. I am an attorney with the firm of Platt Cheema Richmond PLLC.

2. My business address is 1201 N. Riverfront Boulevard, Suite 150, Dallas, Texas 75027.

3. I am a member in good standing of the bar of Texas, and the Northern, Eastern, Southern and Western Districts of Texas.

4. My Texas bar identification number is 24082369.

5. A current certificate of good standing from the State Bar of Texas is attached to this Affidavit as Exhibit A.

6. The following is a complete list of any previous disciplinary proceedings concerning my practice of law that results in a non-confidential negative finding or sanction by the disciplinary authority of the bar of any state or any United States court: None.

7. I attest that I am a registered user of ECF in the United States District Court for the Western District of Pennsylvania.

8. I attest that I have read, know and understand the Local Rules of the Court for the United States District Court for the Western District of Pennsylvania.

9. Based upon the foregoing, I respectfully request that I be granted *pro hac vice* admission in this matter.

I certify and attest that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are false, I am subject to punishment.

Dated: November 6, 2019



Laura E. Brandt

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Motion for Admission *Pro Hac Vice* of Laura E. Brandt was filed electronically on November 6, 2019. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Laura E. Brandt

Laura E. Brandt
Counsel for Defendant Agentra, LLC

Exhibit A

STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

November 06, 2019

Re: Laura Elizabeth Brandt, State Bar Number 24082369

To Whom It May Concern:

This is to certify that Laura Elizabeth Brandt was licensed to practice law in Texas on November 02, 2012, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension from the practice of law.

This certification expires 30 days from the date, unless sooner revoked or rendered invalid by operation of rule or law.

Sincerely,

Seana Willing
Chief Disciplinary Counsel
SW/web

